

United States Courts
Southern District of Texas
FILED

May 28, 2025

Nathan Ochsner, Clerk of Court

Sealed

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

vs.

(1) CLEMENTE MELENDEZ GUTIERREZ
aka Antonio Morales, and
(2) BRENTA FRANCISCA BANDA IZETA
aka Camila,

Defendants.

CRIMINAL NO. 4:25-cr-00283

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1

(Sex Trafficking by Means of Force, Fraud, and Coercion - Victim 1)
18 U.S.C. §§ 1591 and 2

1. From in or about September 2020, through on or about March 11, 2021, in the Houston Division of the Southern District of Texas and elsewhere, Defendant

CLEMENTE MELENDEZ GUTIERREZ aka Antonio Morales

in and affecting interstate and foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means Victim 1, knowing, and in reckless disregard of the fact, that means of force, threats of force, fraud, coercion, and any combination of such means would be used to cause Victim 1 to engage in a commercial sex act, and aided and abetted, in violation of 18 U.S.C. §§ 1591(a)(1), (b)(1), and 2.

COUNT 2

(Conspiracy to Commit Sex Trafficking by Means of Force, Fraud, and Coercion)
18 U.S.C. §§ 1594(c) and 1591(a)(1)

2. From in or about January 2021, through on or about March 11, 2021, in the Houston Division of the Southern District of Texas and elsewhere, Defendants

**CLEMENTE MELENDEZ GUTIERREZ aka Antonio Morales and
BRENDA FRANCISCA BANDA IZETA aka Camila**

knowingly conspired and agreed with each other and others known and unknown, in and affecting interstate and foreign commerce, to recruit, entice, harbor, transport, provide, obtain, and maintain by any means Victim 1, knowing, and in reckless disregard of the fact, that means of force, threats of force, fraud, coercion, and any combination of such means would be used to cause Victim 1 to engage in a commercial sex act in violation of 18 U.S.C. §§ 1594(c) and 1591(a)(1).

COUNT 3

(Coercion and Enticement of Victim 1 for Prostitution)
18 U.S.C. §§ 2422(a) and 2

3. From in or about September 2020, through in or about January 2021, in the Houston Division of the Southern District of Texas and elsewhere, Defendant

CLEMENTE MELENDEZ GUTIERREZ aka Antonio Morales

knowingly persuaded, induced, enticed, and coerced Victim 1 to travel in interstate and foreign commerce to engage in prostitution, and in any sexual activity for which a person could be charged with a criminal offense, and aided and abetted, in violation of 18 U.S.C. §§ 2422(a) and 2.

COUNT 4

(Bringing an Alien to the United States for Financial Gain)
8 U.S.C. § 1324(a)(2)(B)(ii) and 18 U.S.C. § 2

4. In on or about January 2021, in the Houston Division of the Southern District of Texas and elsewhere, Defendant

CLEMENTE MELENDEZ GUTIERREZ aka Antonio Morales

and others known and unknown, aiding and abetting each other, knowingly attempted to bring and brought an alien, namely, Victim 1, to the United States, for the purpose of commercial advantage and private financial gain, knowing and in reckless disregard of the fact that Victim 1 had not received prior official authorization to come to, enter, and reside in the United States, regardless of any official action which may later be taken with respect to such alien, in violation of 8 U.S.C. § 1324(a)(2)(B)(ii) and 18 U.S.C. § 2.

COUNT 5

(Harboring an Alien for Financial Gain)

8 U.S.C. §§ 1324(a)(1)(A)(iii) and 1324(a)(1)(B)(i)

5. From in or about January 2021, through on or about March 11, 2021, in the Houston Division of the Southern District of Texas and elsewhere, Defendant

CLEMENTE MELENDEZ GUTIERREZ aka Antonio Morales

knowing and in reckless disregard of the fact that an alien, namely, Victim 1, had come to, entered, and remained in the United States in violation of law, attempted to and did conceal, harbor, and shield Victim 1 from detection in buildings and other places for the purpose of commercial advantage and private financial gain, in violation of 8 U.S.C. §§ 1324(a)(1)(A)(iii) and (a)(1)(B)(i).

NOTICE OF FORFEITURE

6. Pursuant to 18 U.S.C. § 1594(d), the United States gives notice to Defendants

**CLEMENTE MELENDEZ GUTIERREZ aka Antonio Morales
BRENDA FRANCISCA BANDA IZETA aka Camila**

that upon their conviction of any of Counts 1 or 2, the United States intends to seek forfeiture of:

- (A) all property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such violation, and any property traceable to such property; and

(B) all property, real or personal, that constitutes or is derived from any proceeds obtained, directly or indirectly, as a result of such violation, or any property traceable to such property.

7. Pursuant to 18 U.S.C. § 2428(a), the United States gives notice to Defendant

CLEMENTE MELENDEZ GUTIERREZ aka Antonio Morales

that upon his conviction of Count 3, the United States intends to seek forfeiture of:

(A) all property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violation; and

(B) all property, real or personal, that constitutes or is derived from any proceeds obtained, directly or indirectly, as a result of such violation.

8. Pursuant to 8 U.S.C. § 1324(b)(1) and 18 U.S.C. § 982(a)(6), the United States gives notice to Defendant

CLEMENTE MELENDEZ GUTIERREZ aka Antonio Morales

that upon his conviction of Counts 4 or 5, the United States intends to seek forfeiture of:

(A) any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offense of which the person is convicted; and

(B) any property, real or personal –

i. that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense of which the person is convicted; or

ii. that is used to facilitate, or is intended to be used to facilitate, the commission of the offense of which the person is convicted.

MONEY JUDGMENT AND SUBSTITUTE ASSETS

The United States intends to seek the imposition of a money judgment against each defendant. Defendant is notified that in the event that one or more conditions listed in 21 U.S.C. § 853(p) exists, the United States will seek to forfeit any other property of the Defendant up to the amount of the money judgment against the Defendant.

TRUE BILL:

Original Signature on File

FOREPERSON OF THE GRAND JURY

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